

**UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA	)	
	)	
v.	)	Criminal No: 20-CR-10012-IT
	)	
PAUL BATEMAN,	)	
Defendant.	)	
_____	)	

**JOINT MOTION TO EXTEND DEADLINE FOR FILING RESTITUTION MEMO**

Now come the parties and respectfully request additional time to file submissions regarding restitution in this matter. As grounds therefor, the parties state that counsel for the defendant has reached agreement with counsel for 23 victims and is awaiting response from counsel for an additional six victims (five of whom are represented by the same legal team). Based on the experience of both the undersigned AUSA and counsel for the defendant, the parties anticipate that the defense will be able to reach agreement with victim counsel on the outstanding requests. This additional time will not impact the Court's ability to adjudicate the issue of restitution in a timely manner, even if it were to be contested. 18 U.S.C. § 3664(d)(5) (restitution must be determined within 90 days of sentencing). *See also Dolan v. United States*, 560 U.S. 605 (2010) (notwithstanding statutory 90-day deadline for final determination of restitution, district judge retains the power to order restitution, at least where that court made clear prior to the deadline's expiration that it would order restitution, leaving open only the amount). The parties therefore request that the deadline for filing of restitution memoranda be enlarged to on or after July 22, 2024 (61 days post-sentencing).

Respectfully submitted,

JOSHUA S. LEVY  
Acting United States Attorney

By: /s/ Anne Paruti  
Anne Paruti  
Assistant United States Attorney

June 20, 2024

**CERTIFICATE OF SERVICE**

I, Anne Paruti, hereby certify that this document filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/ Anne Paruti  
Assistant United States Attorney

Dated: June 20, 2024